
State Water Resources Control Board

Underground Storage Tank (UST) Cleanup Fund News: Timing Considerations for Submitting Reimbursement Requests (as of May 31, 2016)

Highlight: Reimbursement Requests submitted in June and July have the shortest processing times.

Reimbursement Request data have been shared online. The UST Cleanup Fund posted a number of graphs to provide information about Reimbursement Requests received and reimbursed. By using the information contained in these graphs, claimants should have more knowledge in order to make decisions regarding seeking reimbursement for costs associated with their claim. The graphs can be found on the UST Cleanup Fund Reports/Statistics webpage at:

http://www.waterboards.ca.gov/water_issues/programs/ustcf/reports_stats.shtml.

Review of the data shows Reimbursement Requests submitted in June and July have the shortest processing times. Reimbursement Requests submitted in August through November have the longest processing times. With this information, claimants may choose to submit Reimbursement Requests during other months. Specifically, claimants who wait until September to submit all costs incurred during the fiscal year should be out of pocket a smaller amount for a shorter period of time if they submit Reimbursement Requests electronically during June or July for costs incurred from July through April. Although Reimbursement Requests received to meet the September 30th deadline are likely to take several months until processed, the amount requested may be smaller if they cover only the last few months of the fiscal year.

A consequence to Claimants choosing to submit more Reimbursement Requests in June and July is a potential slowdown of the processing time during those months. However, if the result is reducing the number of Reimbursement Requests submitted during the higher volume months and if the total number of Reimbursement Requests submitted during the year does not increase significantly, there may be positive impacts for the months that currently have very high processing times.

There is a delay in starting to review Reimbursement Requests because of the number of Reimbursement Requests preceding them in the queue. Although reimbursement is slow at times, electronic Reimbursement Requests take much less time to review and make payment (in about 90 days). Payment of eligible costs submitted in **paper** Reimbursement Requests takes about 60 days longer than electronic Reimbursement Requests **and** slows down review of **all** Reimbursement Requests. The more Reimbursement Requests that are submitted electronically and that include required supporting documentation, the shorter all reimbursement times can be. However, payment of any Reimbursement Request that has issues (e.g., needs determination of current legal claimant, lacks required documentation, needs extra review due to excessive costs, etc.) is typically delayed varying amounts of time.

The following graphs provide information about Reimbursement Requests received and reimbursed. Other data are also online at the link above.

Monthly Reimbursement Requests Received

The graph shows the number of Reimbursement Requests the UST Cleanup Fund received by month since claims began being assigned Annual Site Budgets. The graph shows that there is a sharp increase during the months of August through October, which is a consequence of the September 30th deadline for submitting all costs incurred during the previous fiscal year. (Direct Link:

http://www.waterboards.ca.gov/water_issues/programs/ustcf/docs/fund_stat/rrs_received_month.pdf)

Average Reimbursement Times

The graph shows the number of days for a Reimbursement Request to be reimbursed, depending on the month it is received. From the graph, claimants are able to evaluate the months that Reimbursement Requests could be submitted to receive reimbursement sooner. For Reimbursement Requests submitted to the UST Cleanup Fund during the glut (August through October) due to the September 30th deadline, Reimbursement Requests are paid much slower than those submitted in other months. (Direct link:

http://www.waterboards.ca.gov/water_issues/programs/ustcf/docs/fund_stat/avg_rr_time_frames_042216.pdf)

IMPORTANT: The UST Cleanup Fund, in conjunction with the Office of Enforcement Fraud, Waste, and Abuse Unit, routinely audits, investigates and, as necessary, prosecutes for fraud, waste, and abuse against the program. Each claimant is responsible for actively monitoring its consultant and thoroughly examining costs in RRs submitted to the UST Cleanup Fund. Claimants should question costs that are not clear or appear inconsistent with activities being conducted at the site. Consultants should use professional judgment and raise issues to their claimants, regulatory agency, and the UST Cleanup Fund. Consultants should also ensure invoices adhere to requirements as stated in Health and Safety Code section 25299.57(b)(2)(C) and Fund Regulations section 2812(d).

All claims are subject to audit at any time. Claimants and their consultants should maintain an accurate record-keeping and financial management system that provides efficient accountability of all reimbursed funds used to clean up the above-mentioned site. Retain records continually for at least three years after final payment from the UST Cleanup Fund. The retention period shall be extended until completion of any audit in progress.

~~~HELPFUL LINKS~~~

UST Cleanup Fund Website:

http://www.waterboards.ca.gov/water_issues/programs/ustcf/

~~~CONTACT US~~~

If you have any questions, please contact us by email to:

ustcleanupfund@waterboards.ca.gov

Subject Line: "When to Submit a Reimbursement Request"

Email inquiries will be responded to within 48 hours.

Telephone Message Line: 1-800-813-Fund (3863)

Telephone messages will be responded to within 48 hours.